

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

PING (WINNIE) YIP,

Plaintiff,

vs.

HUGS TO GO LLC and
AUDREY STORCH,

Defendant.

Civil Action No. 08-CV-4746(ksh)

**MOTION TO DISMISS and REQUEST
FOR SANCTIONS BASED ON
RULE 11 VIOLATIONS, VEXATIOUS
LITIGATION, RES JUDICATA,
COLLATERAL ESTOPPEL
And INJUNCTIONS/PROTECTIVE
ORDERS**

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A) INTRODUCTION

As stated below in 1. PRELIMINARY STATEMENT thru v. REQUEST FOR INJUNCTIVE RELIEF AND AWARD OF DAMAGES, I have reiterated the history behind the Plaintiff's continuous attempts to harass and non stop filing of frivolous suits against myself, JAAM LLC, JAAM'S clients, and now a new and totally separate company, HUGS TO GO LLC. The following pages show the history and results of the Plaintiff's damaging actions to defendant Audrey Storch. This new filing now marks over 8 or more attempts by the Plaintiff to sue me on the same issues which this court and others have already ruled WITH PREJUDICE, CASE CLOSED in my favor. By filing against me for this exact same issues the Plaintiff has broken the law, under several legal

doctrines. **RES JUDICATA (claim preclusion)**: The principle that a final judgment of a competent court is conclusive upon the parties in any subsequent litigation involving the same cause of action. Under Res Judicata the federal courts have traditionally adhered to a final judgment on the merits of an action precludes the parties or their privies from relitigating issues that were or could have been raised in that action involving a party to the first case. **COLLATERAL ESTOPPEL**-Under COLLATERAL ESTOPPEL, once a court has decided an issue of fact or law necessary to its judgment, that decision may preclude relitigation of the issue in a suit on a different cause of action involving a party in the first case.

Judge Wigentons' ruling dated July 31st, 2008 in Case No: 2:08-cv-2370(SWD) is the basis for this court to apply both Res Judicata and Collateral Estoppel now. Copy of ruling attached.

RULE 11

In the United States, Rule 11 of the Federal Rules of Civil Procedures and similar state rules require that an attorney (Feng Li during all the previous filings and it is believed that he is helping on this filing as well) and/or the pro se litigant perform a due diligence investigation concerning the factual basis for any claim or defense. (See heading **B. THE IMMEDIATE PRIOR PENDING ACTION section and C. PLAINTIFF'S CLAIMS AGAINST THIS DEFENDANT ARE DISMISSED**). These sections along with the following others show how through all the proceedings the Plaintiff whether with an attorney or Pro Se has consistently violated and ignored Rule 11. Plaintiff's filings over the past proceedings have been held by the courts to be untimely, incomplete or totally unfounded, especially in 3 filings against me in the Bankruptcy court, which barred Plaintiff from further claims against me. Plaintiff's repeated claims (five against me personally, over four or more against JAAM LLC and now against HUGS TO GO LLC, a company which has nothing to do with the accused products) wastes the court's and the other parties' (mine) time, resources and legal fees. Accordingly, sanctions may and

should be imposed by this court upon Plaintiff and/or Plaintiff's counsel presenting the frivolous defense or claim. The law firm or pro se may also be sanctioned, or even held in contempt.

Defendant HUGS TO GO LLC, a newly started LLC, started with the only business purpose to sell, market and distribute HUGGEE MISS YOU dolls. HUGGEE MISS YOU dolls are a huggable picture frame doll I personally invented before JAAM LLC was even started, before I even met the Plaintiff. Rather than provide a true statement of fact or belief, Plaintiff merely has repeated her previous allegations without any evidence as to the goods offered by HUGS TO GO LLC. Plaintiff has full knowledge, based on her stalking my every move via phone, emails and where I am, that HUGS TO GO LLC never has touched, spoke of, sold, presented, showed or have any dealings business or otherwise of selling any product but HUGGEE MISS YOU. Plaintiff's only reason for filing again is to cause this defendant more harm and distress.

Plaintiff has also named me personally as a defendant, despite the fact that this court has previously dismissed Plaintiff's claims against me personally. The dismissal was with prejudice, meaning that Plaintiff cannot bring the identical claims against me.

Due to the Plaintiff having absolutely no proof or evidence and KNOWINGLY filed this suit with false claims, knowing HUGS TO GO LLC and myself have nothing to do with any product covered by Plaintiff's alleged intellectual property rights, the Plaintiff has clearly violated Rule 11 and is clearly a vexatious litigant. WHEREFORE, this defendant respectfully requests that this court dismiss plaintiff's claims against HUGS TO GO LLC and this defendant (repeating the dismissal already ruled in Case No: 2:08-cv-2370(SDW)-Copy attached) with prejudice, and AWARD this defendant such costs, fees and other monetary award as the Court deems just and appropriate.

As evidence of the costs directly attributed to Plaintiff's improper litigation conduct, I present the following information:

- 1) Leonard Singer-Bankruptcy attorney-\$2895.00 is owed on TOP of the \$3000.00 JAAM LLC paid his firm for the bankruptcy filing. This additional \$2895.00 is now owed by the defendant due to the Plaintiffs' repeated unsuccessful attempt at filing bankruptcy fraud on the defendant. Plaintiff lost its claims of bankruptcy fraud all three times and Judge Steckroth **barred Plaintiff from bringing such claims court. Plaintiff's pattern of improper litigation conduct and constant harassment filings incurred extra fees by defendant.** Attached is letter from Zatella & Singer Esq. stating the rulings and Judge Steckroth's statement of allowing sanctions if any further actions were taken/filed by the Plaintiff against this defendant, Audrey Storch plus the billing clearly showing the extra costs Plaintiff intentionally caused.
- 2) Cozen O'Connor-\$78,964.46 (plus other bills that came after JAAM filed for bankruptcy). \$7500.00 was paid up front. The amount of the bills from this law firm was almost solely **derived from Plaintiff's** continuous vexatious filings against me personally, all of which ended up as dismissed.
- 3) Loss of business-Due to the time and energy the Plaintiff has caused this defendant to spend in these past 3 years in gathering all necessary paperwork for her unfounded filings tremendous amount of business has been lost, as well as time that could not be spent in earning a living. Plaintiff clearly stated in her third bankruptcy fraud filing against me that she will do everything she can to stop me from earning a living in my field.
- 4) Emotional Distress-Plaintiff THREATENED this defendant in Judge Wigenton's court. Judge Wigenton's clerk, Carmen Liola-court stenographer kindly offered for this court to call her to verify the Plaintiff threats to this defendant of, "I will sue Audrey Storch all I want. I will do whatever I want to Audrey Storch. I can record any phone calls, it is legal." In the State of New Jersey it is only legal to record a phone conversation A) with one party consent - which Plaintiff did not have and B) not to cause harm or intent to harm or injure or slander the defendant - which is exactly why she did record messages as you can read in attached exhibits. Plaintiff also used these tapings to find

out where I was, to keep stalking me. These threats were not on the written record as they occurred after Judge Wigenton had just ruled in **my** favor, and **had just warned** Ms. Ping Yip NOT TO FILE AGAIN and that she did not want to see Ms. Yip in her court again. Judge Wigenton advised Plaintiff that further filings would result in my request for sanctions to be allowed. Judge Wigenton's ruling was in **my** favor **dismissing Plaintiff's action with prejudice.** A copy of the ruling is attached. After giving the ruling, the Judge then stood up, at which point I stated, "Your honor, as the past years have shown, this person will NOT STOP harassing me, stalking me, suing me tapping my phone hacking my emails unless this court stops her." That is when the Judge stated her above comment and advised me to try and get a protective order against the Plaintiff. Then the Plaintiff threatened me with the above remarks about doing whatever she wants to me. Ms. Carmen Liola informed me once the Judge stands up all typing of proceedings stop. But she clearly remembered the Plaintiff threatening me and will gladly be a witness and welcomes your call on this issue. It was for Case No:2:08-cv-2370(ksh). As the court knows, **despite having that case closed by this court,** Plaintiff tried to submit the complaint in this action before the court again, to attempt to reopen the case. Once she realized she would lose and be sanctioned as Judge Wigenton had stated and also would not even open the case to her, Plaintiff quickly changed it to this court and got it another case number. This clearly again shows the lack of respect and arrogance of the Plaintiff to this court and our justice system. The Plaintiff's abuse of the legal system in this case has also robbed my family of the time and attention needed. As a mother the time of all these filings, motions, answers, briefs have literally stolen the last 3 precious years of my last child living at home to spend the time he needed with me. His needs for me to help with college, going to look, investigate, apply and much more was severely, and I do seriously mean severely shortchanged as over 75% of my spare time was spent in preparing filings constantly either in State, Federal or Bankruptcy courts to answer all of the Plaintiff and Plaintiffs attorney's unfounded harassing and unsubstantiated

allegations. My youngest son was hit by a car last year and the stress of the Plaintiff's non-stop filing while trying to care for my son was not only completely uncalled for but as stated there were no legal grounds for any of the Plaintiff's filings as per this court and all the other courts rulings. The Plaintiff's means were not for justice as no laws by the defendant were broken, (but many were broken by the Plaintiff-Res Judicata, Collateral Estoppel and Vexatious litigation) but for vengeance about obsession of JAAM'S products and to myself also. This defendant also lost tremendous amount of time due to the Plaintiff's vexatious litigation to JAAM'S clients in trying to reassure and help them from the Plaintiff's continuous unfounded allegations. My oldest son in college also was denied my time and attention due to the Plaintiff's breaking Rule 11 along with my husband having to deal with being stalked and harassed. Plaintiff tried numerous times to add my husband also.. The stalking and constant filings of the Plaintiff has put an extreme emotional toll on my entire family. As per the laws stated, I respectfully request the court apply any and all sanctions allowed by Res Judicata, Collateral Estoppel and Vexatious Litigant allowed as this Plaintiff has caused extreme damage to many people and only the law will stop her.

5) Supplies: We respectfully ask sanctions for repayment for cost of all the ink/paperwork/ office supplies that were needed to answer these frivolous filings. As the court is well aware of ink alone to make 4 set of copies of hundreds of pages can be well over \$300.00 for one filing alone. We ask for sanctions in the amount of \$1200.00 for ink and \$50.00 for paper. Postage fees. Due to the Plaintiff doing literally almost 20 or more different filings, adding family names so she could re file every time the Plaintiff lost (which was all filings ruled in my favor) we have spent well over \$250.00 if not more in postage. As you can see Plaintiff put her son, brother, brother in law, herself and would do it in all separate filings causing Defendant to have to make copies and mail via certified mail all of these answers to each and every Plaintiff. The last Answer to Dismiss (ruled in my favor-copy enclosed-was over 150 pages alone.) I had to make 4 sets of

copies and even though her brother/brother in law lives in China and her son lives with her I had to send each one separately to the same address at \$30.00 per person due to the size and weight. That was one answer alone that cost me \$90.00. I am in the same position this time as far as size of answer. I respectfully request the maximum allowed.

6) Health: Due to the Plaintiffs continuous harassment my family and I have suffered tremendously. My family members, friends, clients and I have been afraid to email or call for fear of the Plaintiff hacking in or recording phone calls. In addition, Plaintiff left messages (I have the tape recording of it) stating: "I am at the Judge and I know you are away. You can come get at judge...." She left this message on JAAM'S phone before it was disconnected. She was using clients (one is in the exhibits of the taped phone calls) and having them ie: Gene Baillergeon, find out where I was. When I went to California during JAAM'S bankruptcy sale to get away on vacation, Plaintiff had Gene call me, act as a buyer use up my time on my vacation over two hours of it, and had him find out where I am. She then left that message on the phone. I come back and it is scary to hear someone you already know is hacking your emails, recording phone calls and now leaving messages "I know you are away in California." Mentally it is very scary and it scared my kids very much. My health was very bad due to the stress all the suits the Plaintiff put JAAM and myself through. The stalking was the last straw. I also am recovering now from an ulcer which my doctors feel was able to get so severe due to the Plaintiff. After Judge Wigentons' ruling we hoped it would be over, as we knew the Plaintiff was now barred from two courts and the laws against frivolous and vexatious lawsuits and doctrines of Res Judicata and Collateral Estoppel would not allow this to continue. But as the court sees, literally nothing will stop this Plaintiff unless severe sanctions are applied and enforced, including a protective order and a finding of contempt of court. Knowing this Plaintiff as well as I do, whatever ruling the court does, she will file again. I beg the court to rule that I and HUGS TO GO LLC or any company I work for cannot be served by Ping Yip, Cheung Fung Tsang, Jian Hua Fei and

Feng Li and anyone else the Plaintiff will think of. Filing against HUGS TO GO LLC, a new company with which I wanted to start fresh, is emotionally for me the last I can take. How can you sue or file against a company or person for something they have never done and you have absolutely no proof of? It is so obvious that Plaintiff's actions are for a twisted vengeance only, with no merit or legal basis.

7) Right to Earn a Living: The Plaintiffs continuous litigations has harmed my reputation which I worked for over a decade in the toy/gift field by suing my previous employer's company, the company that bought the products out of bankruptcy, and clients among others. By suing the new company I am trying to get up and running, claiming that it is selling a product that it has never sold is causing extreme financial hardship to the new company and myself as clients are afraid to purchase ANY product from me due to the Plaintiffs' extremely harassing actions and frivolous lawsuits. The clients all say that, how can she sue you over and over and for something you did not do? If she can do that to you, she will try it to anyone you sell to, as she has so much hate she will use vengeance on any of us, your clients. Plaintiff has already done, as this court is aware of. I am aware that Plaintiff is backing out of a settlement deal with at least one of the former clients, so that Plaintiff can cause more harm and stress. Plaintiff has made it quite clear for some reason she thinks no matter where I work, I am selling or making that particular product. Plaintiff is so manically obsessed with suing over an old product, that nothing will stop her from coming after me no matter what I do. This financially hurts my new little doll company. After finding out she sued Bearhands (a former employer) no one wants to hire me for fear she will bring a frivolous law suit against them. Even though we know we always win, the cost in legal fees, time, health is just not worth it. I have lost years of income due to Plaintiff's vexatious conduct.

C. RULE 11.-VEXATIOUS LITIGATION

Vexatious Litigation is legal action which is brought, regardless of its merits, solely to harass or subdue and adversary. It may take the form of a primary frivolous lawsuit, such as all 5 +

suits against myself, three bankruptcy fraud claims against myself, 8 + suits against JAAM's clients and this suit against HUGS TO GO and myself. My present company has never sold, touched, marketed, or had ANY reference to the claims in the complaint, all stale claims, the same ones used in her previous dozens of claims against myself and JAAM LLC. **Vexatious litigation** may be the repetitive, burdensome, and unwarranted filing of meritless motions in a matter which is otherwise a meritorious **cause of action**. Filing against HUGS TO GO is merit less and filing against myself when ruling has been made on same issue is also illegal. Filing vexatious litigation is considered an abuse of the **judicial process** and in this case **should** result in sanctions against the offender, Plaintiff Ms. Ping Yip, and all persons working with her in support of these claims, like Cheung Fung Tsang, and Jian Hua Fei. The definition of vexatious litigation matches exactly to what this Plaintiff has done for the past years. Cheung Fung Tsang (Plaintiffs son-of adult age) and Jian Hua Fei (Plaintiffs brother or brother in law) have been identified by Plaintiff in previous filings as co-plaintiffs. Plaintiff likes to keep filing with their names on it and then without so she can call a complaint a "new" filing. Wherefore I respectfully ask this court to include ALL parties this Plaintiff including Mr. Feng Li, the attorney that has been working on the Plaintiff's behalf on record and off the record. Based on prior conduct, Plaintiff will just keep filing under any of the names listed above to keep these frivolous claims in court.

I am aware that a single action, even a frivolous one, is not enough to raise a litigant to the level of being declared vexatious, but repeated and severe instances such as filing against a company who there is no supporting evidence to support such filing plus filing the same claims when a ruling has been made four previous times and the Plaintiff has now been **barred** from **TWO COURTS** and the following documented filings and rulings all in the defendants favor and the stalking and the threats and the suing of clients, some who never even sold the products show the vexatious nature of this Plaintiff.

I also have reasonable belief, due to the Plaintiff's behavior to fear for my personal safety and the safety of my family. In addition to Plaintiff's stalking behavior, the individual hired by

Plaintiff to serve papers has tried to enter my home during the last serving of this filing, against my will. The server tried to gain entrance into my foyer by putting one of his feet onto my foyer floor and pushed his head into the open door area and was literally turning his head and trying to look at everything he could while trying to put more of his body into my home. **He only left when my two dogs challenged him and scared him off.** After the number of summons and pleadings which this Plaintiff has served on myself and **any company I have been associated with**, the feeling of the escalating desperateness of the Plaintiff as this continues, **makes me fearful** of what the Plaintiff will do next. Plaintiff has already shown no regard for the law by suing anyone and everyone (we have been called by other defendants whom this Plaintiff sued and lost (including state court actions in Bergen County) incurring costs on other small companies, such as \$100,000.00 in costs for a case involving a \$500.00 land survey mistake. I have been advised by lawyers for other victims of Plaintiff that her attorney, Feng Li now has many complaints made to the bar towards him by other lawyers, law firms and even judges while pursuing other vexatious and frivolous suits on behalf of Plaintiff against anyone they can. **Plaintiff falsely** made believe she could not speak English to cause even more financial hardship during litigation against myself and others requiring unnecessary translators for deposition and court appearances. During the suit in Bergen County, Plaintiff actually answered the defendants lawyer without waiting for the translator, proving she understands English perfectly. During a deposition in one of the prior actions against me, Plaintiff was actually smirking while the translator translated, knowing that I knew the translator was not needed but was in fact incurring additional costs during litigation. I bring this up to show character of Plaintiff and Rule 11 allows any and all other suits the vexatious litigant is or was involved in to be brought up to show history. This court is also aware of Plaintiff and her attorney suing 8 or more of JAAM'S clients. The Plaintiff intentionally did numerous actions in this court during that proceeding to cause more harm to those defendants and to mock this court and the legal system to her whims. **Examples of Plaintiff's abuse of the court system include:** (1) Knowingly suing companies she knew did not sell the product, such as Amazon.com for one. (2) Stating right in the court to

the Honorable Judge about Amazon.com - "They should pay more because they have a lot of money and I want it." The judge clearly explained the law to her that the law does not see the size of the company, only the law. Plaintiff knew this but did not care. (3) **Deliberately having her attorney fail to appear in court for the purpose of delay.** Plaintiff has had her attorney not show at multiple hearings before in filings against myself and JAAM LLC so she would not have to pay his hourly wage. But knowing we all do. (4) Intentionally **dragging on proceedings** and arguing to extend the hours so the defendants would be caused more financial hardship **as their attorneys charge by the hour.**

Due to this conduct, I respectfully ask this court to impose any and all maximum sanctions **against** Plaintiff and her attorney, **in favor of defendants**, as **neither will not stop such conduct without extreme measures, and also a protective order in favor of defendant,** barring any of the above mentioned people from contacting myself in any form in any manner at anytime along with any company I work for. I also respectfully ask that the Plaintiff, her attorney, her son, relatives, friends cannot serve me with any further filings as the court has ruled with prejudice and case closed and to make such sanctions to the legal maximum amount to help deter Plaintiff and the rest from the continuous harassment to myself and now HUGS TO GO LLC another totally innocent party. *The principles* of Res Judicata and Collateral Estoppel are to relieve parties of the costs and vexation of multiple lawsuits (which Plaintiff has already done more than a dozen different filings all on the same claim/issue), **and** to conserve judicial resources (which the Plaintiff is causing tremendous costs to all in Passaic and Bergen Counties). Without the help of this court to shut down this vexatious litigant all of the above will not be enforced or followed.

Some jurisdictions have a list of vexatious litigants: people who have repeatedly abused the legal system. Feng Li, **as Plaintiff's counsel**, is **facilitating Plaintiff** as a vexatious **litigant for the purpose of causing financial and emotional damage** not only to myself, JAAM LLC, HUGS TO GO LLC, but also to JAAM'S clients, Bearhands and others, has reached not only a sum that

is unconscionable to the defendants but also to the courts. The insult to our justice system by both of these parties has now become not only unethical but illegal.

D. FRIVILUOUS LITIGATION: It is also illegal to KNOWINGLY sue a company for something you know they are not doing/selling. The “proof” the Plaintiff has attached to the filing for this claim against HUGS TO GO LLC is the same stale exhibits/evidence used in all the filings done previously against myself and JAAM LLC in which the Plaintiff lost in all. I believe it falls under the Res Judicata and Collateral Estoppel law as rulings have been made numerous times already. This “evidence” does not apply or show any wrongdoing on the part of HUGS TO GO. In fact all the tape recordings **and intercepted emails acquired by Plaintiff** clearly state over and over that JAAM LLC is out of business, that the **accused books can only be purchased from other stores or from Bearhands who bought the product from the bankruptcy trustee.** HUGS TO GO is only offering HUGGEE MISS YOU. Plaintiff has had all these stolen recordings, emails and information for many many months and has had plenty of time to read them. Since they so clearly state HUGS TO GO only does HUGGEE MISS YOU, the Plaintiff has not only broken the law of knowingly suing a company for something they are not/did not do and based on all the dozens of other frivolous and vexatious filings has clearly violated Rule 11. Wherefore I respectfully again request any and all sanctions allowed by the maximum amount the law applies to the Plaintiff plus costs for legal, loss of business, emotional, costs of the supplies to constantly answer and print all of these filings and a protective order so my constitutional right to freedom and the pursuit of happiness cannot be blocked by the Plaintiff anymore. I have a right to earn a fair and honest living and this constant harassment by this Plaintiff and her attorney and her family members has at times totally stopped my ability to earn a living and hindered it. The Plaintiff is also hurting my business relationships by suing anyone that worked with JAAM LLC.

SUMMATION

A. As per the rules stated above, **RULE 11, RES JUDICATA, COLLATERAL ESTOPPEL AND VEXATIOUS AND FRIVOLOUS LITIGATION**, I respectfully

ask the court to grant the defendant not only the sanctions asked for above, namely, legal fees, office supplies, mental distress, and loss of business, but also I **implore this court to recognize that Plaintiff** for over THREE YEARS now has not only caused myself and JAAM LLC and now HUGS TO GO LLC extreme hardships due to her/their constant frivolous filings not only in Federal but also State and Bankruptcy courts to stop this excessive abusive person from pursuing her vengeful nature through **abuse of the legal system** and allowing her to cause such harm to so many people.

- B. Unless the utmost of sanctions is handed down, Plaintiff will file again and again. **Plaintiff THREATENED such action** in Judge Wigentons' court and **has followed up with the threat**. Plaintiff is still having people email my new company under false pretenses and is hacking in or getting copies of those emails, as well as recording additional phone conversations. Strange cars sitting outside my house, yes. But hard to prove. I still feel and know I am being stalked so I implore the court for a court protective order based on the exhibits the PLAINTIFF supplied! The Plaintiff clearly proved her stalking me by filing copies of all her hacking and taping of calls.
- C. As a pro se I apologize for not knowing the laws to ask upon, but can the court do anything to make sure this is the very last time the Plaintiff can cause me this harassment and litigation? I must earn a living and emotionally and physically cannot do this anymore. The Plaintiff has cost me almost everything and yet I do not harbor ill will or vengeance. I only ask to be allowed to have my constitutional rights not violated by her anymore or my monies going to legal bills or my time instead of earning a living spent on this. My family needs me and they have had enough also.
- D. In final summation I believe the laws I stated will allow the court to grant me my requests. I also know HUGS TO GO LLC as an innocent party should be allowed sanctions also. As a new company this is slander and hurts its reputation. To knowingly tell others something you know is untrue that puts it in a bad light is slander. The Plaintiff knows full well HUGS TO GO LLC is not selling the books.

As for me, Res Judicata and Collateral Estoppel takes care of the filing against me along with Judge Wigenton's order. The Plaintiff has so little respect for this court by filing it again thinking she can get it past to another judge.

I thank your Honor very much for your time and efforts and I so hope this horrible use of our laws and abuse of me can be stopped. The United States District Court should not be a place for Winnie Ping Yip and Feng Li to be allowed to constantly cause people harm and hardship and this time I hope the court tells her in a way she will finally understand, through large, very large sanctions and court protective order and barring her from filing any of this again.

I have attached the full filing with exhibits given to Judge Wigenton on the fourth filing of the Plaintiff against me so this court can read the full history. I hope it was of help and not a hinderance.

Copies AGAIN of all of this have been sent to:

Ping (Winnie) Yip

58 West Saddle River Road

Saddle River, NJ 07458

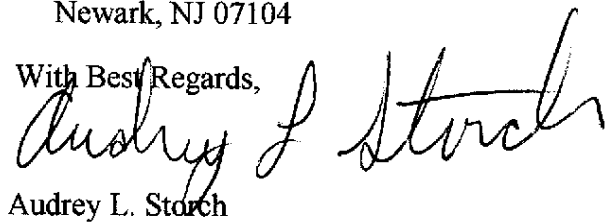
(201) 316-6270

United States District Court

50 Walnut Street

Newark, NJ 07104

With Best Regards,

A handwritten signature in cursive script, appearing to read "Audrey L. Storch". The signature is written in dark ink and is positioned above the printed name.

Audrey L. Storch